



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Francis P. Cannon, Treasurer  
Campaign For Working Families  
499 South Capitol St., SW, Ste. 410  
Washington, DC 20003

FEB 11 1998

Identification Number: C00325076

Reference: 12 Day Pre-Special Report (7/1/97-12/24/97)

Dear Ms. Cannon:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your calculations for Line 31, Columns A and B appear to be incorrect. FEC calculations disclose these amounts to be \$932,887.31 and \$1,352,535.16. Please provide the corrected total(s) on the Detailed Summary Page.

-Line 11(a)(i) of your report discloses a total of \$403,885.51 in contributions from individuals, however, the sum of the entries itemized on Schedule A indicates the total to be \$449,415.61. It appears that your committee may have disclosed duplicate entries for several contributors. Please amend your report to clarify this discrepancy.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek

retribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

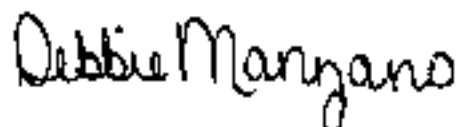
-Line 17 of the Detailed Summary Page discloses receipts for dividends and interest during the reporting period. If this figure includes any receipts from a single source, that aggregate greater than \$200 in the calendar year, please amend your report(s) by itemizing the receipts on Schedule A. 2 U.S.C. §434(b)(2)(F)

-Please amend your report by providing the address and purpose for each disbursement itemized on Schedule B supporting Line 21(b).

-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer and certified by a notary public. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or consent with, or at the request or suggestion of any candidate, or any authorized committee or agent of such committee. Please amend your Schedule E accordingly.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink that reads "Debbie Manzano". The script is cursive and fluid, with the first name "Debbie" and last name "Manzano" clearly legible.

Debbie Manzano  
Senior Reports Analyst  
Reports Analysis Division

## SCHEDULE A

ITEMIZED RECEIPTS  
PERIOD 07/01/97 - 12/24/97PAGE 069 OF 217  
LINE #11a

Any information copied from such reports or statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

## CAMPAIGN FOR WORKING FAMILIES

## FULL NAME AND MAILING ADDRESS

## OCCUPATION/PLACE OF BUSINESS

MRS. BETH E KNOTT  
2688 MAYFIELD RD #15  
CLEVELAND ETS OH 44106

INFO REQUESTED, NOT RECD  
INFO REQUESTED, NOT RECD

RECEIPT FOR: ☐ PRIMARY ☐ GENERAL  
☒ OTHER (SPECIFY)-----

AGGREGATE  
YEAR-TO-DATE \$300.00

DATE:  
97/12/12

AMOUNT  
\$300.00

## FULL NAME AND MAILING ADDRESS

## OCCUPATION/PLACE OF BUSINESS

MR. KENNETH F LUTKE  
10569 HICKORY PLACE  
STRONGSVILLE OH 44136

CFA  
SELF

RECEIPT FOR: ☐ PRIMARY ☐ GENERAL  
☒ OTHER (SPECIFY)-----

AGGREGATE  
YEAR-TO-DATE \$1300.00

DATE:  
97/10/07

AMOUNT  
\$1200.00

## FULL NAME AND MAILING ADDRESS

## OCCUPATION/PLACE OF BUSINESS

MS. SUSAN S BROOME  
141 E PIONEER TRL  
AURORA OH 44202

FREELANCE WRITER  
SELF EMPLOYED

RECEIPT FOR: ☐ PRIMARY ☐ GENERAL  
☒ OTHER (SPECIFY)-----

AGGREGATE  
YEAR-TO-DATE \$400.00

DATE:  
97/10/23

AMOUNT  
\$100.00

## FULL NAME AND MAILING ADDRESS

## OCCUPATION/PLACE OF BUSINESS

MRS. SYLVIA C SLIFKO  
3479 E TUSCARAWAS  
BARBERTON OH 44203

HOUSEWIFE  
SLIFKO CONSTRUCTION INC

RECEIPT FOR: ☐ PRIMARY ☐ GENERAL  
☒ OTHER (SPECIFY)-----

AGGREGATE  
YEAR-TO-DATE \$5000.00

DATE:  
97/07/29  
97/10/30

AMOUNT  
\$2000.00  
\$10000.00

## SCHEDULE A

ITEMIZED RECEIPTS  
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LINE #11a

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## CAMPAIGN FOR WORKING FAMILIES

## =====

FULL NAME AND MAILING ADDRESS

OCCUPATION/PLACE OF BUSINESS

MR. HUDSON B SAFFELL  
134 EMERALD BAY  
LAGUNA BEACH CA 92651

RETIRED  
INFO REQUESTED, NOT RECD

RECEIPT FOR: <input type="checkbox"/> PRIMARY <input type="checkbox"/> GENERAL	AGGREGATE	DATE:	AMOUNT
<input checked="" type="checkbox"/> OTHER (SPECIFY)-----	YEAR-TO-DATE \$750.00	97/12/01	\$500.00

FULL NAME AND MAILING ADDRESS

OCCUPATION/PLACE OF BUSINESS

MS. KIM C BENGARD  
25501 LONE PINE CIR  
LAGUNA HILLS CA 92653

INFO REQUESTED, NOT RECD  
INFO REQUESTED, NOT RECD

RECEIPT FOR: <input type="checkbox"/> PRIMARY <input type="checkbox"/> GENERAL	AGGREGATE	DATE:	AMOUNT
<input checked="" type="checkbox"/> OTHER (SPECIFY)-----	YEAR-TO-DATE \$5000.00	97/11/14	\$5000.00

FULL NAME AND MAILING ADDRESS

OCCUPATION/PLACE OF BUSINESS

MR. THOMAS P BENGARD  
25501 LONE PINE CIR  
LAGUNA HILLS CA 92653

INFO REQUESTED, NOT RECD  
INFO REQUESTED, NOT RECD

RECEIPT FOR: <input type="checkbox"/> PRIMARY <input type="checkbox"/> GENERAL	AGGREGATE	DATE:	AMOUNT
<input checked="" type="checkbox"/> OTHER (SPECIFY)-----	YEAR-TO-DATE \$5000.00	97/09/22	\$100.00
		97/11/14	\$5000.00

FULL NAME AND MAILING ADDRESS

OCCUPATION/PLACE OF BUSINESS

MR. J DEREK LEWIS  
2481 BAYSHORE DR  
NEWPORT BEACH CA 92663

INFO REQUESTED, NOT RECD  
JDL SECURITIES INC

RECEIPT FOR: <input type="checkbox"/> PRIMARY <input type="checkbox"/> GENERAL	AGGREGATE	DATE:	AMOUNT
<input checked="" type="checkbox"/> OTHER (SPECIFY)-----	YEAR-TO-DATE \$500.00	97/11/13	\$100.00
		97/11/19	\$100.00

